

STATE OF TENNESSEE
Office of the Attorney General



PAUL G. SUMMERS
ATTORNEY GENERAL AND REPORTER

ANDY D. BENNETT
CHIEF DEPUTY ATTORNEY GENERAL

LUCY HONEY HAYNES
ASSOCIATE CHIEF DEPUTY
ATTORNEY GENERAL

Reply to:
Consumer Advocate and Protection Division
Attorney General's Office
P.O. Box 20207
Nashville, TN 37202

MICHAEL E. MOORE
SOLICITOR GENERAL

425 FIFTH AVENUE NORTH
NASHVILLE, TN 37243-0485

TELEPHONE (615) 741-3491
FACSIMILE (615) 741-2009

April 3, 2002

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: United Cities Gas Petition for Approval
of New or Revised Franchise Agreements with
Kingsport, Bristol, Morristown, and Maury County
Docket No. 00-00562

Dear Mr. Waddell:

Enclosed is an original and thirteen copies of the Attorney General's Motion for Rescheduling Briefing Schedule in the above-referenced matter. Copies are being furnished to counsel of record for interested parties.

Sincerely,

TIMOTHY C. PHILLIPS
Assistant Attorney General

cc: Counsel of Record
53981

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

UNITED CITIES GAS PETITION FOR
APPROVAL OF NEW OR REVISED
FRANCHISE AGREEMENTS WITH
KINGSPORT, BRISTOL, MORRISTOWN
AND MAURY COUNTY

)
)
) Docket No. 00-00562
)
)
)
)
)
)

ATTORNEY GENERAL'S MOTION FOR RESCHEDULING BRIEFING SCHEDULE

The Tennessee Attorney General, through the Consumer Advocate and Protection Division ("Attorney General"), files this motion requesting the rescheduling of the briefing schedule in this matter.

In support of this motion, the Attorney General wishes to notify the Tennessee Regulatory Authority ("TRA") that the court reporter did not deliver the transcript of the March 14, 2002 hearing until April 1, 2002. The court reporter indicated at the hearing of this matter that the transcript would be delivered on March 28, 2002. The briefing schedule was set in reliance on this promise. As a result, the Attorney General has three (3) days to complete the brief rather than the seven (7) days originally envisioned by the hearing officer.

The Attorney General requests that the briefing schedule be modified so that the Attorney General's brief is due on April 8, 2002. Any response by United Cities would be due on April 15, 2002. The deadline for the Attorney General filing a reply would move to April 18, 2002,

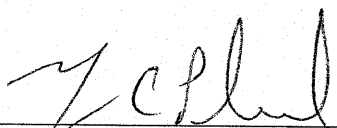
which is actually fewer days than originally envisioned.

There is little impact on the progress of this matter before the TRA. The briefing would be complete on April 18, 2002, instead of April 16, 2002 as now contemplated.

Jack W. Hyder, Jr., legal counsel for the City of Bristol, advises that the City of Bristol does not object to the extension requested. The Attorney General has notified counsel for the City of Morristown and United Cities Gas of the request to modify the briefing schedule, but has not received a response as yet.

Respectfully submitted,

PAUL G. SUMMERS
Tennessee Attorney General



TIMOTHY C. PHILLIPS, B.P.R. #012751
Assistant Attorney General
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
(615) 741-3533

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail on

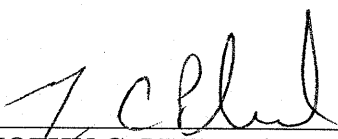
April 3, 2002 on the following:

Jonathon Wike, Esq.
General Counsel
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505
FAX # (615) 741-5015

Joe A. Conner, Esq.
Baker, Donelson, Bearman & Caldwell
1800 Republic Centre
633 Chestnut Street
Chattanooga, Tennessee 37450-1800
FAX # (423) 752-4410

Richard C. Jessee, Esq.
City Attorney
Bacon, Jessee & Perkins
1135 West Third North Street
Morristown, Tennessee 37814
FAX # (423) 581-6883

Jack W. Hyder, Jr., Esq.
Massengill, Caldwell and Hyder, P.C.
777 Anderson Street
P.O. Box 1745
Bristol, TN 37621
FAX # (423) 764-1179



TIMOTHY C. PHILLIPS
Assistant Attorney General